



ATTORNEYS AT LAW
www.margolisedelstein.com

DELAWARE OFFICE:
1509 GILPIN AVENUE
WILMINGTON, DE 19806
302-777-4680
FAX 302-777-4682

LORI A. BREWINGTON, ESQUIRE
lbrewington@margolisedelstein.com

November 2, 2006

PHILADELPHIA OFFICE: *
THE CURTIS CENTER, 4TH FLOOR
601 WALNUT STREET
INDEPENDENCE SQUARE WEST
PHILADELPHIA, PA 19106-3304
215-922-1100
FAX 215-922-1772

VIA FACSIMILE AND REGULAR MAIL

Molly DiBianca, Esquire
Young Conaway Stargatt & Taylor LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0319

HARRISBURG OFFICE: *
3510 TRINDLE ROAD
CAMP HILL, PA 17011
717-975-8114
FAX 717-975-8124

RE: Terry Snyder v. Citi Steel USA, Inc.

PITTSBURGH OFFICE:
310 GRANT STREET
THE GRANT BUILDING, SUITE 1500
PITTSBURGH, PA 15219
412-281-4256
FAX 412-642-2380

Dear Molly:

In response to your letter of October 19, 2006, below is an outline of plaintiff's employers, the dates worked, etc.

SCRANTON OFFICE:
THE OPPENHEIM BUILDING
409 LACKAWANNA AVENUE
SUITE 3C
SCRANTON, PA 18503
570-342-4231
FAX 570-342-4841

SOUTH NEW JERSEY OFFICE: *
SENTRY OFFICE PLAZA
216 HADDON AVENUE, 2ND FLOOR
P.O. Box 92222
WESTMONT, NJ 08108
856-858-7200
FAX 856-858-1017

NORTH NEW JERSEY OFFICE:
CONNELL CORPORATE CENTER
THREE CONNELL DRIVE
SUITE 6200
BERKELEY HEIGHTS, NJ 07922
908-790-1401
FAX 908-790-1486

1. **Temporary Staffing Co., Wilmington, DE,**
 - (a) position held – several this is a temporary placement company. She worked at different places while registered as a receptionist, accounting clerk, customer service.
 - (b) dates of employment- 2003 through 2005;
 - (c) hours worked per week – approximately 12 to 40 hours per week depending on assignment;
 - (d) pay rate – approximately \$11.00 to \$12.00 depending on assignment;
 - (e) supervisor – Vickie Collins
 - (f) an application was completed for her employment
 - (g) reason for leaving - her employment ended due to no assignments available.
2. **Verizon Service Corp,**
 - (a) position held – customer service/collections;
 - (b) dates of employment – August 2005 – does not remember when employment ended;

* MEMBER OF THE HARMONIE GROUP

- (c) hours worked per week – approximately 40 hours per week;
 - (d) pay rate - \$10.00 before training - \$11.00 after;
 - (e) supervisor – “Bizz” does not remember her proper name;
 - (f) an application for employment was completed;
 - (g) reason for leaving – she was let go for being late too many times.
3. **Franklin Company, Wilmington, DE,**
- (a) position held – file clerk;
 - (b) dates of employment – 8/2004 through 8/2004 (just a few weeks)
 - (c) hours worked per week – approximately 40 hours per week;
 - (d) rate of pay – approximately \$16.00 per hour;
 - (e) supervisor – does not remember;
 - (f) no application for employment; sent resume via fax hired that same day;
 - (g) reason for leaving – got another job.
4. **Bayshore Ford Truck Sales Inc., DE**
- (a) position held – secretary/accounting clerk;
 - (b) dates of employment – worked in 2005 just a few days (3);
 - (c) hours worked – approximately 24 hours - 8 hours for 3 days;
 - (d) pay rate – approximately \$12.00 per hour;
 - (e) supervisor – does not remember;
 - (f) an application for employment was completed;
 - (g) reason for leaving – let go via phone call for not learning the job quick enough.
5. **Vintage Properties, LLC, New Castle, DE**
- (a) position held – leasing agent;
 - (b) dates of employment - July 8, 2005-September 3, 2005;
 - (c) hours worked – approximately 16 hours per week;
 - (d) rate of pay – approximately \$8.00 per hour;
 - (e) supervisor – does not remember;
 - (f) an application for employment was completed;
 - (g) reason for leaving – not enough hours.
6. **Delaware Temp Systems,**
- (a) – (g) Ms. Snyder does not remember any information with regards to this employer.
7. **American Flag Inc., Middletown, DE,**
- (a) position held – road side flagger;
 - (b) dates of employment - 4/2004 (just a few weeks);
 - (c) hours worked – approximately 52 hours per week;
 - (d) rate of pay – approximately \$18.00 per hour;
 - (e) supervisor – Brandy Redrow;
 - (f) an application for employment was completed;
 - (g) reason for leaving – let go for insubordination.

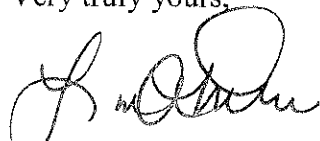
8. **Abacus Consulting Inc., Claymont, DE**
 - (a) position – accounting clerk;
 - (b) dates of employment – June 2005;
 - (c) hours worked – (not employed for a full week);
 - (d) rate of pay – approximately \$12.00 per hour;
 - (e) supervisor - Kelly (does not remember the last name);
 - (f) an application of employment was completed;
 - (g) reason for leaving – no work available.

9. **Skelly Group, 610 West State Street, Media, PA**
 - (a) position – truck driver/operator;
 - (b) dates of employment - March 2006 through June 2006;
 - (c) hours worked – approximately 60 hours per week;
 - (d) rate of pay - approximately \$18.00 per hour;
 - (e) supervisor – Lou Cobb or Jim Poor;
 - (f) an application for employment was completed;
 - (g) reason for leaving – missed time within the 90 days probation period.

10. **Delaware Valley Express, Hay Road, Wilmington, DE**
 - (a) position – truck driver;
 - (b) dates of employment - June 2006;
 - (c) hours worked – approximately 12 hours;
 - (d) rate of pay – approximately \$135.00 flat pay only worked one day;
 - (e) supervisor – Charlie and/r Walter – does not remember their last names;
 - (f) an application for employment was completed;
 - (g) reason for leaving – no runs available, the driving got to her.

Please advise if you should need anything further.

Very truly yours,



LORI A. BREWINGTON

LAB/rt

* * * Transmission Result Report (MemoryTX) (Nov. 2. 2006 6:04PM) * * *

1)
2) Margolis Edelstein

Date/Time: Nov. 2. 2006 5:51PM

File No. Mode	Destination	Pg (s)	Result	Page Not Sent
3053 Memory TX	5763476	P. 4	OK	

Reason for error
E.1) Hang up or line fail
E.3) No answer

E.2) Busy
E.4) No facsimile connection

BERKELEY HEIGHTS OFFICE
Three Corners Drive
Suite 1000
Berkeley Heights, NJ 07002-2778
908-780-1401
Fax 908-780-1488

WESTMONT OFFICE
1000 2727 - 2ND Hudson Avenue
Westmont, NJ 08109-2868
908-885-7200
Fax 908-885-1017

PITTSBURGH OFFICE
310 Grant Street
Ste. 1500, The Grant Building
Pittsburgh, PA 15219-2203
412-281-4200
Fax 412-942-2380

**MARGOLIS
EDELSTEIN**
Attorneys at Law
1509 Gilpin Avenue
Wilmington, DE 19808-3015
302-777-4080
Fax 302-777-4682

PHILADELPHIA OFFICE
The Quinly Center
1000 17th Floor
Independence Square West
Philadelphia, PA 19102-3606
215-422-1100
Fax 215-422-1772

SCRANTON OFFICE
400 Lockwood Avenue
Scranton, PA 18503-7000
570-342-4231
Fax 570-342-4541

HARRISBURG OFFICE
3510 Tindle Road
Camp Hill, PA 17011-4439
717-975-8114
Fax 717-975-8174

FAX COVER SHEET

TO:	FROM:
Molly DiBianca, Esquire	Lori A. Brewington, Esquire
COMPANY:	DATE:
Young Conaway Stargatt & Taylor	November 2, 2006
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
576-3476	
PHONE NUMBER:	RE:
	Snyder v. CitiSteel, USA, Inc.
<input type="checkbox"/> urgent	<input type="checkbox"/> for review
<input type="checkbox"/> please comment	<input type="checkbox"/> please reply

CONFIDENTIAL NOTICE: This facsimile and any accompanying page(s) is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable laws. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication, or that taking of any action or defense on the basis of the information, may be strictly prohibited. If you have received this facsimile in error, please notify us immediately by telephone (call), mail or in the original message to us at the above address via U.S. Postal Service. Thank you.